



Pillsbury  
Winthrop  
Shaw  
Pittman<sup>LLP</sup>

2300 N Street, N.W.  
Washington, D.C. 20037-1128

Tel 202.663.8000  
Fax 202.663.8007  
[www.pillsburylaw.com](http://www.pillsburylaw.com)

February 6, 2006

Glenn S. Richards  
Phone: 202.663.8215  
[glenn.richards@pillsburylaw.com](mailto:glenn.richards@pillsburylaw.com)

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Re: **Certification of CPNI Filing (February 6, 2006)**  
**EB-06-TC-060**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed please find Onvoy, Inc.'s Compliance Certificate as required by 47 C.F.R. §64.2009(e), for the period January 1, 2005-December 31, 2005, along with the Company's accompanying statement explaining how its operating procedures ensure compliance with the rules.

Sincerely,

\_\_\_\_\_  
/s

Glenn S. Richards  
Pillsbury Winthrop Shaw Pittman, LLP

Attachment

Cc: Byron McCoy, Enforcement Bureau (via e-mail)  
Best Copy and Printing (via e-mail)

## Onvoy, Inc.'s Compliance Certification

February 6, 2006

I certify as an officer of Onvoy; that I have personal knowledge that Onvoy, Inc. has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission requirements as it pertains to Customer Proprietary Network Information, 47 C.F.R. §64.2009(e).

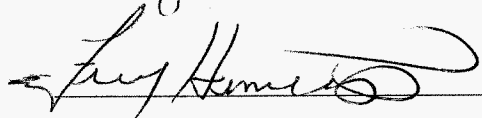
PRINTED NAME

Fred Hendricks

POSITION

Chief Operation Officer

SIGNATURE



DATE

2-3-2006

## **Onvoy, Inc.'s Compliance Statement Regarding CPNI**

**For the Period January 1, 2005-December 31, 2005**

### **Compliance with 47 C.F.R § 64.2001-2009**

#### **Notice and Approval.**

Onvoy is in compliance with the rules requiring notice and approval to use customer proprietary network information (CPNI). Onvoy's processes require that new customers signed a CPNI use authorization. This authorization is kept on file in Onvoy's offices in both paper and electronic form. Onvoy does not conduct marketing campaigns that use CPNI. If it did, Onvoy would not use the CPNI of those customers who withheld approval.

#### **Protecting Confidentiality.**

Onvoy maintains the security of CPNI. Onvoy has security measures in place to protect this data from:

- external attacks to its network,
- improper use of web portals provided to wholesale and retail customers,
- improper use of FTP (file transfer protocol) sites where customers can obtain data, and
- improper verbal requests for data via personal contacts with Onvoy's Customer Care.

All of Onvoy's network equipment and servers are located in facilities where Onvoy maintains the physical security of the building. At a network level, Onvoy employs several firewalls to secure the infrastructure and management of its network. Onvoy also uses secure ID technology for access to its local area network (LAN). Onvoy's network equipment is behind additional firewalls on its own dedicated network with limited employee access.

Onvoy's web portals allow toll data to be viewed and downloaded by our retail customers. It has login/password security and uses encryption to ensure the security of this information. The web portal allows customers to only access their specific data. Onvoy's FTP site allows wholesale customers to obtain their specific toll records. Onvoy's web portal and FTP sites uses standard industry security and current state of the art firewall architecture. Onvoy has procedures in place in its Customer Care division that allow only customers of record to obtain their specific call detail information. Onvoy has a code of conduct and training for all employees concerning the use and handling of CPNI, and provides strict disciplinary measures for violations of the code. Onvoy does not provide CPNI to non-affiliated third parties and does not sell CPNI.